

**REMARKS**

In the non-final Office Action, the Examiner rejects claims 10-12 and 17-19 under 35 U.S.C. § 102(e) as being anticipated by ANDERSSON et al. (U.S. Patent No. 7,023,846); and rejects claim 20 under 35 U.S.C. § 103(a) as being unpatentable over ANDERSSON et al. in view of AGGARWAL et al. (U.S. Patent No. 6,330,614). Applicants respectfully traverse these rejections.<sup>1</sup> Claims 10-12 and 17-20 remain pending.

Claims 10-12 and 17-19 have been rejected under 35 U.S.C. § 102(e) as allegedly anticipated by ANDERSSON et al. Applicants respectfully traverse this rejection.

A proper rejection under 35 U.S.C. § 102 requires that a reference teach every aspect of the claimed invention. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. ANDERSSON et al. does not disclose or suggest the combination of features recited in Applicants' claims 10-12 and 17-19.

For example, claim 10 recites a method of configuring a networking device. The method includes generating a first forwarding table; generating a second forwarding table; programming a filter to perform a lookup operation in the first forwarding table if a first field value of a received packet meets one or more conditions of a first set of conditions; programming the filter to initiate a lookup operation in the second forwarding table if the first field value does not meet one or more conditions of the first set of

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<sup>1</sup> As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine reference, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

conditions. ANDERSSON et al. does not disclose or suggest this combination of features.

For example, ANDERSSON et al. does not disclose or suggest programming a filter to perform a lookup operation in a first forwarding table if a first field value of a received packet meets one or more conditions of a first set of conditions. The Examiner relies on Fig. 11, column 4, lines 43-56, and column 10, lines 22-49 (which describes Fig. 11) of ANDERSSON et al. as allegedly disclosing this feature (Office Action, pg. 3). Applicants respectfully disagree with the Examiner's interpretation of ANDERSSON et al.

At column 4, lines 43-56, ANDERSSON et al. discloses:

A packet received over the incoming interface 210 is forwarded by the packet processing logic 220 to the outgoing interface 230. Within the packet processing logic 220, the incoming packet processing logic 222 determines the FEC and outgoing interface for the packet (which, in this example, is the outgoing interface 230), and forwards the packet to the outgoing packet processing logic 224 associated with the outgoing interface 230. Briefly, if the packet includes label switching information that is associated with an LSP mapped in the incoming forwarding table 240, then the incoming packet processing logic 222 forwards the packet based upon the label switching information according to the label mapping information contained in the incoming forwarding table 240.

This section of ANDERSSON et al. discloses forwarding packets based upon label switching information if the packet includes label switching information that is associated with a label switching path in an incoming forwarding table. This section of ANDERSSON et al. does not disclose or suggest programming a filter to perform a lookup operation in a first forwarding table if a first field value of a received packet meets one or more conditions of a first set of conditions, as required by claim 1.

At column 10, lines 22-49, ANDERSSON et al. discloses:

The label detection logic 1102 receives packets from the incoming interface 210, and

determines for each packet whether the packet is labeled or unlabeled. If the packet is unlabeled, then the label detection logic 1102 forwards the packet to the routing logic 1104 (indicated by the arrow 1103), which forwards the packet over the interface 223 based upon the network layer addressing information in the packet according to routing information contained in the routing table 250. If the packet is labeled, then the label detection logic 1102 forwards the packet to the incoming label switching logic 1106 (indicated by the arrow 1105). The incoming label switching logic 1106 uses the incoming forwarding table 240 to determine whether the packet is associated with an existing LSP or a new LSP to be established. If the packet is associated with an existing LSP, then the incoming label switching logic 1106 forwards the packet over the interface 223 based upon the label switching information in the packet according to the label mapping information contained in the incoming forwarding table 240. If the packet is associated with a new LSP to be established, then the incoming label switching logic 1106 forwards the packet to the incoming LSP setup logic 1108 (indicated by the arrow 1107), which sets up the new LSP by adding the new label to the incoming forwarding table 240 and mapping the new label to the corresponding FEC and outgoing interface based upon the network layer addressing information in the packet as well as routing information contained in the routing table 250.

This section of ANDERSSON et al. discloses forwarding unlabeled packets based upon the network layer addressing information in the packet according to routing information contained in the routing table and forwarding labeled packets to the incoming label switching logic 1106. If the packet is associated with a new LSP to be established, then the incoming label switching logic 1106 forwards the packet to the incoming LSP setup logic 1108, which sets up the new LSP by adding the new label to the incoming forwarding table 240 and mapping the new label to the corresponding FEC and outgoing interface based upon the network layer addressing information in the packet as well as routing information contained in the routing table 250. This section of ANDERSSON et al. does not disclose or suggest programming a filter to perform a lookup operation in a first forwarding table if a first field value of a received packet meets one or more conditions of a first set of conditions, as required by claim 1.

ANDERSSON et al. further does not disclose or suggest programming the filter to initiate a lookup operation in the second forwarding table if the first field value does not

meet one or more conditions of the first set of conditions. The Examiner relies on column 4, lines 60-65 of ANDERSSON et al. as allegedly disclosing this feature (Office Action, pg. 3). Applicants respectfully disagree with the Examiner's interpretation of ANDERSSON et al.

At column 4, lines 60-65, ANDERSSON et al. discloses that "[t]he outgoing packet processing logic 224 determines whether the packet is associated with an LSP mapped in the outgoing forwarding table 260, and inserts label switching information to the packet before forwarding the packet to the outgoing interface 230 if the packet is associated with an LSP mapper in the outgoing forwarding table 260." This section of ANDERSSON et al. does not disclose or suggest programming the filter to initiate a lookup operation in the second forwarding table if the first field value does not meet one or more conditions of the first set of conditions, as also required by claim 1.

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by ANDERSSON et al.

Claims 11 and 12 depend from claim 10. Therefore, these claims are not anticipated by ANDERSSON et al. for at least the reasons given above with respect to claim 1.

Claim 17 recites features similar to, yet possibly of different scope than, features recited above with respect to claim 10. Therefore, Applicants submit that claim 17 is not anticipated by ANDERSSON et al. for reasons similar to the reasons given above with respect to claim 10.

Claims 18 and 19 depend from claim 17. Therefore, these claims are not

anticipated by ANDERSSON et al. for at least the reasons given above with respect to claim 17.

Claim 20 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over ANDERSSON et al. in view of AGGARWAL et al. Applicants respectfully traverse.

Claim 20 depends from claim 17. Applicants submit that the disclosure of AGGARWAL et al. does not remedy the deficiencies in the disclosure of ANDERSSON et al. set forth above with respect to claim 17. Therefore, Applicants submit that claim 20 is patentable over ANDERSSON et al. and AGGARWAL et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 17.

In view of the foregoing remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

While the present application is now believed to be in condition for allowance, should the Examiner find some issue to remain unresolved, or should any new issues arise which could be eliminated through discussions with Applicants' representative, then the Examiner is invited to contact the undersigned by telephone in order to expedite prosecution.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: May 2, 2007

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